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**RASH CURTIS & ASSOCIATES**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SANDRA MCMILLION, JESSICA  
ADEKOYA, and IGNACIO PEREZ, on  
Behalf of Themselves and all Others Similarly  
Situated,

Plaintiffs,

v.

RASH CURTIS & ASSOCIATES,

Defendant.

Case No. 4:16-cv-03396-YGR

**JOINT DISCOVERY DESIGNATIONS  
AND OBJECTIONS**

Date: April 12, 2019  
Time: 9:00 a.m.  
Courtroom 1, 4th Floor

Judge: Hon. Yvonne Gonzalez Rogers

**I. PLAINTIFF'S DISCOVERY DESIGNATIONS:**

<b>NO.</b>	<b>FORM OF EXCERPT</b>	<b>DESIGNATION</b>	<b>LEGAL OBJECTION</b>
<b>1</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 10:15-16:22</b>	
<b>2</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 17:3-19</b>	
<b>3</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 18:5-20:18</b>	
<b>4</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 20:19-24:13</b>	
<b>5</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 24:21-26:10</b>	
<b>6</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 26:11-27:6</b>	
<b>7</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 27:7-27:25</b>	
<b>8</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 28:18-29:20</b>	
<b>9</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 35:4-21</b>	
<b>10</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 36:12-37:7</b>	
<b>11</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 37:11-13</b>	
<b>12</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 38:4-39:12</b>	
<b>13</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 40:10-41:11</b>	
<b>14</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 41:12-42:13</b>	
<b>15</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 45:15-46:5</b>	
<b>16</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 47:7-48:13</b>	
<b>17</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 48:14-51:13</b>	
<b>18</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 51:15-52:3</b>	
<b>19</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 52:9-18</b>	
<b>20</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 54:3-57:15</b>	
<b>21</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 57:23-59:6</b>	
<b>22</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 64:9-16</b>	
<b>23</b>	<b>VIDEO</b>	<b>4/13/17 Kizer Dep. 72:18-74:14</b>	

NO.	FORM OF EXCERPT	DESIGNATION	LEGAL OBJECTION
24	VIDEO	4/13/17 Kizer Dep. 74:20-75:23	
25	VIDEO	4/13/17 Kizer Dep. 76:6-22	
26	VIDEO	4/13/17 Kizer Dep. 77:11-81:10	
27	VIDEO	4/13/17 Kizer Dep. 82:4-85:5	
28	VIDEO	4/13/17 Kizer Dep. 85:10-18	
29	VIDEO	4/13/17 Kizer Dep. 88:1-8	
30	VIDEO	4/13/17 Kizer Dep. 99:10-100:12	
31	VIDEO	4/13/17 Kizer Dep. 100:21-102:2	
32	VIDEO	4/13/17 Kizer Dep. 105:16-107:21	
33	VIDEO	4/13/17 Kizer Dep. 108:22-109:22	
34	VIDEO	4/13/17 Kizer Dep. 111:10-20	
35	VIDEO	10/16/17 N. Keith Dep. 7:19-13:20	
36	VIDEO	10/16/17 N. Keith Dep. 14:1-13	
37	VIDEO	10/16/17 N. Keith Dep. 14:16-16:3	
38	VIDEO	10/16/17 N. Keith Dep. 16:17-17:25	
39	VIDEO	10/16/17 N. Keith Dep. 18:16-18	
40	VIDEO	10/16/17 N. Keith Dep. 18:20-19:14	
41	VIDEO	10/16/17 N. Keith Dep. 7:19-13:20	
42	VIDEO	10/16/17 N. Keith Dep. 19:18	
43	VIDEO	10/16/17 N. Keith Dep. 19:23-25	
44	VIDEO	10/16/17 N. Keith Dep. 20:4-20:8	
45	VIDEO	10/16/17 N. Keith Dep. 20:19-21:7	
46	VIDEO	10/16/17 N. Keith Dep. 21:15-21	
47	VIDEO	10/16/17 N. Keith Dep. 26:22-27:14	
48	VIDEO	10/16/17 N. Keith Dep. 28:5-17	

<b>NO.</b>	<b>FORM OF EXCERPT</b>	<b>DESIGNATION</b>	<b>LEGAL OBJECTION</b>
<b>49</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 29:15-16</b>	
<b>50</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 29:19-30:21</b>	
<b>51</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 31:1</b>	
<b>52</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 34:2-11</b>	
<b>53</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 42:8-13</b>	
<b>54</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 42:17-43:2</b>	
<b>55</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 43:6-45:4</b>	
<b>56</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 45:8</b>	
<b>57</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 51:2-13</b>	
<b>58</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 55:24-57:17</b>	
<b>59</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 57:22</b>	
<b>60</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 60:10-61:8</b>	
<b>61</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 62:14-23</b>	
<b>62</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 63:16-65:2</b>	
<b>63</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 65:11</b>	
<b>64</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 66:9-11</b>	
<b>65</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 66:14</b>	
<b>66</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 69:22-70:18</b>	
<b>67</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 71:13-72:5</b>	
<b>68</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 72:8</b>	
<b>69</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 77:23-78:12</b>	
<b>70</b>	<b>VIDEO</b>	<b>10/16/17 N. Keith Dep. 78:21-79:25</b>	
<b>71</b>	<b>VIDEO</b>	<b>10/20/17 Correa Dep. 11:1-7</b>	
<b>72</b>	<b>VIDEO</b>	<b>10/20/17 Correa Dep. 11:12-13:7</b>	
<b>73</b>	<b>VIDEO</b>	<b>10/20/17 Correa Dep. 13:21-15:3</b>	

NO.	FORM OF EXCERPT	DESIGNATION	LEGAL OBJECTION
74	VIDEO	10/20/17 Correa Dep. 15:21-17:25	
75	VIDEO	10/20/17 Correa Dep. 18:5-20:11	
76	VIDEO	10/20/17 Correa Dep. 20:14-21:4	
77	VIDEO	10/20/17 Correa Dep. 21:10-24:23	
78	VIDEO	10/20/17 Correa Dep. 25:1-26:9	
79	VIDEO	10/20/17 Correa Dep. 26:21-29:22	
80	VIDEO	10/20/17 Correa Dep. 30:9-21	
81	VIDEO	10/20/17 Correa Dep. 43:13-45:22	
82	VIDEO	10/20/17 Correa Dep. 48:22-50:23	
83	VIDEO	10/20/17 Correa Dep. 51:3-52:19	
84	VIDEO	10/20/17 Correa Dep. 55:13-56:16	
85	VIDEO	10/20/17 Correa Dep. 59:14-16	
86	VIDEO	10/20/17 Correa Dep. 65:15-24	
87	VIDEO	10/20/17 Correa Dep. 66:11-22	
88	VIDEO	10/20/17 Correa Dep. 67:10-19	
89	VIDEO	10/20/17 Correa Dep. 69:1-71:14	
90	VIDEO	10/20/17 Correa Dep. 72:20-74:11	
91	VIDEO	10/20/17 Correa Dep. 74:16-75:13	
92	VIDEO	10/20/17 Correa Dep. 80:12-83:25	
93	VIDEO	10/24/17 R. Keith Dep. 8:1-4	
94	VIDEO	10/24/17 R. Keith Dep. 9:9-10:18	
95	VIDEO	10/24/17 R. Keith Dep. 10:21-11:2	
96	VIDEO	10/24/17 R. Keith Dep. 11:6-13:3	
97	VIDEO	10/24/17 R. Keith Dep. 16:24-17:1	
98	VIDEO	10/24/17 R. Keith Dep. 17:5-17:13	

NO.	FORM OF EXCERPT	DESIGNATION	LEGAL OBJECTION
99	VIDEO	10/24/17 Paff Dep. 7:4-18	
100	VIDEO	10/24/17 Paff Dep. 7:21-8:23	
101	VIDEO	10/24/17 Paff Dep. 9:6-14	
102	VIDEO	10/24/17 Paff Dep. 12:20-14:15	
103	VIDEO	10/24/17 Paff Dep. 15:19-16:1	
104	VIDEO	10/24/17 Paff Dep. 16:7-14	

## II. DEFENDANT'S DISCOVERY DESIGNATIONS:

NO.	FORM OF EXCERPT	DESIGNATION	LEGAL OBJECTION
1	VIDEO	4/13/17 Kizer Dep. 30:25-31:9	
2	VIDEO	4/13/17 Kizer Dep. 34:25-36:2	
3	VIDEO	4/13/17 Kizer Dep. 37:3-37:5	
4	VIDEO	4/13/17 Kizer Dep. 41:24-42:13	
5	VIDEO	4/13/17 Kizer Dep. 47:7-47:23	
6	VIDEO	4/13/17 Kizer Dep. 48:14-49:3	
7	VIDEO	4/13/17 Kizer Dep. 51:18-52:8	
8	VIDEO	4/13/17 Kizer Dep. 62:25-63:12	
9	VIDEO	4/13/17 Kizer Dep. 64:9-65:15	
10	VIDEO	4/13/17 Kizer Dep. 66:2-6	
11	VIDEO	4/13/17 Kizer Dep. 66:11-18	
12	VIDEO	4/13/17 Kizer Dep. 68:6-10	
13	VIDEO	4/13/17 Kizer Dep. 70:11-72:15	
14	VIDEO	4/13/17 Kizer Dep. 83:13-83:19	

NO.	FORM OF EXCERPT	DESIGNATION	LEGAL OBJECTION
15	VIDEO	4/13/17 Kizer Dep. 83:20-84:5	
16	VIDEO	4/13/17 Kizer Dep. 84:21-85:5	
17	VIDEO	4/13/17 Kizer Dep. 90:5-23	
18	VIDEO	4/13/17 Kizer Dep. 91:3-19	
19	VIDEO	4/13/17 Kizer Dep. 92:11-19	
20	VIDEO	4/13/17 Kizer Dep. 93:6-15	
21	VIDEO	4/13/17 Kizer Dep. 101:14-23	
22	VIDEO	4/13/17 Kizer Dep. 105:16-20	
23	VIDEO	4/13/17 Kizer Dep. 111:13-20	
24	VIDEO	4/13/17 Kizer Dep. 115:22-116:14	
25	VIDEO	4/13/17 Kizer Dep. 117:15-25	
26	VIDEO	4/13/17 Kizer Dep. 120:10-22	
27	VIDEO	4/13/17 Kizer Dep. 120:23-25	
28	VIDEO	4/13/17 Kizer Dep. 121:1-6	
29	VIDEO	4/13/17 Kizer Dep. 121:7-9	
30	VIDEO	4/13/17 Kizer Dep. 121:14-20	
31	VIDEO	4/13/17 Kizer Dep. 123:21-124:5	
32	VIDEO	4/13/17 Kizer Dep. 127:4-127:10	
33	VIDEO	4/13/17 Kizer Dep. 147:14-19	
34	VIDEO	4/13/17 Kizer Dep. 147:20-148:4	
35	VIDEO	4/13/17 Kizer Dep. 156:22-159:3	
36	VIDEO	6/20/17 Kizer Dep. 88:20-25	
37	VIDEO	6/20/17 Kizer Dep. 89:1-3	
38	VIDEO	6/20/17 Kizer Dep. 89:4-7	
39	VIDEO	6/20/17 Kizer Dep. 89:12-17, 89:25-90:10	

<b>NO.</b>	<b>FORM OF EXCERPT</b>	<b>DESIGNATION</b>	<b>LEGAL OBJECTION</b>
<b>40</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 90:14-15</b>	
<b>41</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 90:16-21</b>	
<b>42</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 91:2-20</b>	
<b>43</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 91:21-92:1</b>	
<b>44</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 92:2-6</b>	
<b>45</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 92:7-9</b>	
<b>46</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 92:19-25</b>	
<b>47</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 93:1-5</b>	
<b>48</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 93:16-24</b>	
<b>49</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 93:25-94:4</b>	
<b>50</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 94:5-95:5</b>	
<b>51</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 95:6-10</b>	
<b>52</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 95:18-96:3</b>	
<b>53</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 96:4-11</b>	
<b>54</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 96:12-20</b>	
<b>55</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 96:21-97:11</b>	
<b>56</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 97:12-23</b>	
<b>57</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 97:24-98:2</b>	
<b>58</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 98:5-16</b>	
<b>59</b>	<b>VIDEO</b>	<b>6/20/17 Kizer Dep. 99:2-100:1</b>	
<b>60</b>	<b>VIDEO</b>	<b>7/6/17 Kizer Dep. 226:24-227:3</b>	
<b>61</b>	<b>VIDEO</b>	<b>7/6/17 Kizer Dep. 227:4-7</b>	
<b>62</b>	<b>VIDEO</b>	<b>7/6/17 Kizer Dep. 268:1-4</b>	
<b>63</b>	<b>VIDEO</b>	<b>7/6/17 Kizer Dep. 268:5-8</b>	
<b>64</b>	<b>VIDEO</b>	<b>7/6/17 Kizer Dep. 268:9-20</b>	



NO.	FORM OF EXCERPT	DESIGNATION	LEGAL OBJECTION
65	VIDEO	7/6/17 Kizer Dep. 268:21-269:8	
66	VIDEO	7/6/17 Kizer Dep. 269:9-20	
67	TRANSCRIPT	7/13/2017 Perez Dep. 11:11-13	
68	TRANSCRIPT	7/13/2017 Perez Dep. 11:14-19	
69	TRANSCRIPT	7/13/2017 Perez Dep. 11:21-25	
70	TRANSCRIPT	7/13/2017 Perez Dep. 12:16-18	
71	TRANSCRIPT	7/13/2017 Perez Dep. 17:4-11	
72	TRANSCRIPT	7/13/2017 Perez Dep. 23:2-25	
73	TRANSCRIPT	7/13/2017 Perez Dep. 26:21-25	
74	TRANSCRIPT	7/13/2017 Perez Dep. 27:17-23	
75	TRANSCRIPT	7/13/2017 Perez Dep. 29:11-25	
76	TRANSCRIPT	7/13/2017 Perez Dep. 33:3-10	
77	TRANSCRIPT	7/13/2017 Perez Dep. 37:5-10	
78	TRANSCRIPT	7/13/2017 Perez Dep. 40:3-16	
79	TRANSCRIPT	7/13/2017 Perez Dep. 41:17-23	
80	TRANSCRIPT	7/13/2017 Perez Dep. 42:4-7	
81	TRANSCRIPT	7/13/2017 Perez Dep. 42:17-24	
82	TRANSCRIPT	7/13/2017 Perez Dep. 47:1-11	
83	TRANSCRIPT	7/13/2017 Perez Dep. 47:12-48:2	
84	TRANSCRIPT	7/13/2017 Perez Dep. 49:19-24	
85	TRANSCRIPT	7/13/2017 Perez Dep. 50:19-51:7	

1 Dated:

Respectfully submitted,

2 **BURSOR & FISHER, P.A.**

3 By: /s/ Yeremey Krivoshey  
4 Yeremey Krivoshey

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15 Dated: March 4, 2019

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